

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>20-137</u>
v.	:	DATE FILED: <u>12-14-2021</u>
JONATHAN GOERIG	:	VIOLATIONS:
	:	18 U.S.C. § 2423(b) (travel with the intent
	:	to engage in illicit sexual conduct with a
	:	minor – 1 count)
	:	18 U.S.C. § 2251(a), (e) (manufacture and
	:	attempted manufacture of child
	:	pornography – 4 counts)
	:	18 U.S.C. § 2252(a)(2), (b)(1) (receipt of
	:	child pornography – 3 counts)
	:	18 U.S.C. § 2252(a)(4)(B), (b)(2)
	:	(possession of child pornography – 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 7, 2019, in Ridley Township, Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

JONATHAN GOERIG

traveled in interstate commerce, from Connecticut to Pennsylvania, for the purpose of engaging in illicit sexual conduct with a person who had not attained the age of 18 years, that is, Minor #1.

In violation of Title 18, United States Code, Section 2423(b).

COUNTS TWO THROUGH FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

JONATHAN GOERIG

employed and used Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, and aided and abetted the producing of the visual depiction, that is, by photographing and recording Minor #1 as she was engaged in sexually explicit conduct. The visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer:

Count	Date
2	June 8, 2018
3	July 20, 2018
4	March 27, 2019
5	May 20, 2019

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2.

COUNTS SIX THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

JONATHAN GOERIG

knowingly received visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of a minor engaged in sexually explicit conduct, and the visual depictions were of such conduct:

Count	Date
6	April 16, 2019
7	April 20, 2019
8	April 22, 2019

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 7, 2019, in the Eastern District of Pennsylvania, defendant

JONATHAN GOERIG

knowingly possessed matter, that is, an iPhone 6S cellular telephone bearing IMEI number 353255079217900, and an online storage account, which contained visual depictions that had been shipped and transported in interstate and foreign commerce and which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B), (b)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2423(b), 2251(a), 2252(a)(2), and 2252(a)(4)(B), as set forth in this superseding indictment, defendant

JONATHAN GOERIG

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the superseding indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

- i. a 2015 Ford F-150 truck, bearing Vehicle Identification Number 1FTEW1EGXFFB18305; and
- ii. an iPhone 6S cellular telephone bearing IMEI number 353255079217900.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

Pursuant to Title 18, United States Code, Sections 2428 and 2253.



GRAND 



JENNIFER ARBITTIER WILLIAMS
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JONATHAN GOERIG

SUPERSEDING INDICTMENT

Counts

18 U.S.C. § 2423(b) (travel with the intent to engage in illicit sexual conduct with a minor – 1 count)
18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child pornography – 4 counts)
18 U.S.C. § 2252(a)(2), (b)(1) (receipt of child pornography – 3 counts)
18 U.S.C. § 2252(a)(4)(B), (b)(2) (possession of child pornography – 1 count)
18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

A true bill.



Filed in open court this 14 day,
Of December A.D. 20 21

Clerk

Bail, \$ _____